

These comments are made in response to Cingular's ex parte letter of October 30, 2002.

Cingular states SHHH Study Reports Almost 2/3 of respondents currently use a cell phone. This is because only those who use cell phones responded due to the nature of the request for omments. SHHH reports also that the most popular way to listen is on microphone settings-not T-coil settings. This is true because it is impossible to use T-coil settings because of interference. This interference is due to the magnetic fields generated by the varying battery current from both the battery and associated wiring which can only be solved in the telephone not the hearing aid and Siemen's work with hearing aids will not solve the interference to the T-coil.

Cingular states it is a mulifaceted Problem which is true but solving the problem of in the hearing aid will not solve the interference problem when using the T-Coil. Most if not all hearing aid users find use of the T-coil (if the Aid has one) very helpful as it eliminates the environmantal pickup by the microphone and necessary if the Cell Phone is truly hearing aid compatible.

I have read most of the comments by the Telephone industry and not one of them admits the existence of the magnetic field that interferes with the T-coil. This may be due to fact that since the RF interference to the hearing aids amplifier is present whether the T switch is in the M or T position so this problem is blamed on the hearing aid but if Siemens solves this problem then there will still be interference to the T-coil and Cell phones will not be HAC even if the inductive coupling of the telephone's audio signal is generated.

DAMAX's directional antenna may make it unnecessary to have Hearing Aids immune to RF pickup as the RF emissions in the direction of the head is greatly decrease. Communications with the Cell towers is still possible due to reflections from nearby object such as trees and buildings. Test made by Starkey Laboratories demonstrate the effectiveness of the directinal antenna which decreases the interference by 35 Db (SPL).

Based on data available, I believe that use of the directional antenna and decreasing appreciably the magnetic fields generated by the telephone's battery and associated leads, can result in Cell Telephones being useable by hearing aid so there is no longer any need for the exemption of wireless telephones from the HAC Act of 1988 and the FCC should take appropriate action to revoke it.